

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

LANDON JOE BLACK,

Defendant.

Case No. CR-23-183-JFH

**NOTICE OF FILING PROPOSED
PROTECTIVE ORDER GOVERNING DISCOVERY**

The United States of America, by and through United States Attorney Christopher J. Wilson, Assistant United States Attorney Anthony C. Marek, and Trial Attorney Gwendelynn Bills, hereby submits a revised proposed protective order governing discovery in this matter.

On November 21, 2023, U.S. Magistrate Judge Gerald L. Jackson held a hearing on the government's pending motion for protective order (Dkt. 29). Dkt. 44. During the hearing, the Court requested the parties provide an agreed proposed protective order by November 28. Individual proposed protective orders were to be filed only if necessary.

Unfortunately, the parties have been unable to reach agreement on a joint proposed protective order. Counsel for the Defendant expressed generalized concerns about the breadth of the proposed order but did not provide alternative verbiage or specify any critique other than those given on the record at the motion hearing. Consequently, the United States submits the attached protective order. This amended order is intended to clarify the interaction between the protective order and the existing discovery protections codified at 18 U.S.C. § 3509(m), as well as to provide assurances that, subject to limitations on disclosing specific information about victims and

sensitive law enforcement techniques, the protective order does not impact defense counsel's ability to discuss the case with the Defendant's family.

The government respectfully submits that the protective order, as amended, adequately addresses the defendant's concerns that have been raised at this time and strikes the appropriate balance between the Defendant's interests and the government's interests in protecting victims and sensitive law enforcement techniques. As specified in the order, either party can seek modification of the protective order at a later date.

Accordingly, the government respectfully requests that the attached Protective Order be entered in this case.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on November 28, 2023, I electronically transmitted the attached documents to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrant:

Jarred Lucas Jennings
Counsel for Defendant

s/ Anthony C. Marek
ANTHONY C. MAREK
Assistant United States Attorney